

Solid Waste Section

July 11, 2016

Mr. Lynn Everett
Everett's Clearing and Grading, Inc.
2402 Fred Everett Rd
Kinston, NC 28504

Re: Comments on the revised Permit Application
Everett's Land Clearing and Inert Debris (LCID) Pit
Lenoir County, North Carolina
Location No. P1303, Document ID No. (DIN) 26446

Dear Ms. Everett:

On July 6, 2016 the Division Waste Management (DWM), Solid Waste Section (SWS) received the revised permit application documents for the above-referenced new landfill facility which are on your behalf prepared by J. Branch Smith, PE Consultant Engineer. The documents are listed below:

- June 24, 2016 Letter responds to the DWM comments dated May 13, 2016 (DIN 25941).
- "LCID Maps" – two copies.
- "Operations Plan LCID" – one copy.
- "Revised Permit Application" – one copy
- "Lenoir County Zoning Compliance Letter" – one copy
- "NCDEQ DEMLR Stormwater Emails" – one copy
- "Fire Dept. Letter" – one copy
- "Property Deed" – DB 1644, Pg. 203 – one copy
- "HydroCAD Stormwater Modeling" – one copy
- "NLWC Well Information" -one copy

To facilitate electronic filing the above-mentioned documents to the DWM document tracking system, they are combined into a single document (permit application) with a DIN 26433.

Pursuant to the North Carolina Solid Waste Management Rules (Rule) 15A NCAC 13B .0563 through .0566 and Article 9 of the Chapter 130A of the North Carolina General Statutes (NCGS 130A-290, et seq.), the SWS has reviewed on the permit application. After completing a review, the SWS has several comments on the application stated below. Your timely responses to the comments will expedite the completion of the reviewing processes.

1. (Application Signature Page) Please provide additional or correct info stated below

- i. After completing the initial review of the company registration, the SWS Compliance Office concluded that Everett's Clearing and Grading, Inc. was not registered with the NC Secretary of State. Please have the registration completed according to the June 02, 2016 e-mail message sending to Ms. Mary Ann.
 - ii. According to the conservations during site visit dated May 10, 2016, Mr. Everett wants to be the permit holder, both Permit Operator and Land Owner. Therefore, on the Application Signature Page please use the legal name, Henry Leon Evert, Jr. as shown the property deed (Deed Book 1644 pages 203-206, Lenoir County Register of Deeds). On the Application Signature Page, the business or organization name must be the same as the one registered with the NC Secretary of State.
2. (Operations Plan Section 1 Waste Disposal Plan, Item (q)) Please provide the fire department contact info which is consistent with the info shown on the June 27, 2016 letter issued by the North Lenoir Fire & Rescue.
3. According to the previously submitted application (DIN 25880) dated March 2016 including Report of Seasonal High Water Table Evaluation dated April 5, 2011, the estimated seasonal high water table underneath the proposed landfill site was approximately 81 feet above mean sea level (amsl). Based on this conclusion the elevation of the landfill base was proposed at the elevation of 85 feet amsl to meet the vertical buffer requirement according to 15A NCAC 13B .0564(8)(d). However, the new figure - Drawing No. LCID-3 shows the groundwater elevations are 77 feet and 79.8 feet amsl in LCID Nos.1 & 2, respectively. Why the field the data concluded from the 2011 report is not be credited? Please provide new evidence, theory, and calculation to demonstrate the new groundwater elevations underneath the proposed landfill are acceptable. Please also be advised that even if the existing water inside the proposed landfill site (old mining pit) is pumped to dry, the existing grades shown the Drawing Nos. LCID-2 and LCID 3 can't be defined as the Seasonal High Water Table without the conclusion made by a new subsurface soil investigation.
4. (Drawing No. LCID-3, LCID No. 1 Cross-Section) The landfill (around Station 0+50) is immediately adjacent to the Stormwater Holding Area. Please address the concerns below [Solid waste shall not be disposed in water -Rule 15A NCAC 13B .0566(11)]:
 - i. Should there be an installed engineering device (an earthen dike or fence) along the waste boundary to prevent waste from rolling into Stormwater Holding Area while conducting the waste disposal activities?
 - ii. Please conduct engineering calculations (bearing capacity and/or slope stability analysis) to confirm that (a) the foundation soil underneath the landfill - LCID No.1 can safely support the maximum waste load of landfill without failure. (b)

the maximum side slope and set-back distance from the edge of the Stormwater Holding Area (between Stations 0+30 to 0+40) shall be constructed so that a slope of the Stormwater Holding Area can safely stand under the maximum waste load disposed by it. The designed slope and set-back distance must be noted on the Drawing No. LCID-3

- iii. The proposed maximum top elevation of the LCID- No. 1 is 90 feet amsl with 2% positive slope for settlement and surface drainage as shown on Drawing No. LCID-3 and the proposed fill elevations are not consistent with contours shown on Drawing No. LCID-2. Please clarify.
- 5. Sequence of LCID Construction and Operations is described on Drawing No. LCID-3, but the operation(s) of dewatering the existing water ponding in the proposed landfill is not included. The June 24, 2016 Responses to Comment No. 25 are incomplete. Please respond comments 25i & 25ii in detail associated with dewatering the proposal landfill site.
- 6. Please provide additional information to the Operations Plan and/or drawings:
 - i. Which phase of the landfill - the LCID No. 1 or LCID No. 2 be constructed first?
 - ii. Note the initial waste disposal area at each of the two landfill phases - LCID No.1 and LCID No.2, respectively.
 - iii. Provide descriptions of the stormwater segregation feature(s) or device (s) inside the constructed landfill area to separate the active cell and inactive cell. The features or devices may be relocated in the progressive waste disposal sequence of each landfill phase. To install the stormwater segregation feature(s) or device (s) is required to eliminate excessive amount leachate generated from the waste disposal operations, especially in the wet weather/season.

The SWS requires a hard copy of the written responses to each above-mentioned comment, and one copy of the revised permit application (one hard copy and one electronic copy in pdf format). Please contact me if you have any questions of the comments or the permitting processes.

Sincerely,



Ming-Tai Chao, P.E.
Environmental Engineer
Division of Waste Management, NCDEQ

cc:

J. Branch Smith, P.E.
Wes Hare, DWM
Central File

Ed Mussler, Permitting Branch Supervisor
Drew Hammonds, DWM